

It has come to my attention that a ruling is soon to be made regarding regulations covering Fractional Ownership Operations. As I understand it, the FAA has determined that the operations will not require the use of aircraft dispatchers. It is in my opinion that this is a grave error in judgement. Many of the operations that will be conducted will be such that an aircraft dispatcher would not only be desired but should be required. A vast number of these Fractional Ownership Operations would entail international operations and lengthy flights in which weather and ATC issues will change a number of times creating gaps of information which will inevitably lead to gaps in Safety. Positive Operational Control by certified professionals should be required to maintain the highest level of safety in this fast growing area of the Aviation Industry. Additionally, proper compliance of all applicable FAR's and company operational procedures in regards to the flight begins with the planning process. Therefore, it is important to further guarantee the integrity of the operation by requiring properly trained and certified personell not only in the cockpit but also in the operations nerve center of these companies in the form of aircraft dispatchers. It would seem to me that the purpose of excluding aircraft dispatchers in Fractional Ownership Operations might be to simplify the process by which these companies can start up and become successful. However there are fractional ownership companies that already exist that employ aircraft dispatchers in a variety of ways within the operation in order to make full use of the companies "people" resources. Executive Jet is a well known fractional company that employs certified dispatchers to provide the level of safety and regulatory compliance that the flying public and FAA should demand in the air carriers that the public chooses to fly.

Thank you for your time.

Mark Pacyna - 121 Dispatcher